

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

CHRISTEN CHEN,
a/k/a "Nauti,"
a/k/a "Knotty,"
SHAQOYA HALL,
a/k/a "Q," and
ZACHARY HAMPTON,
a/k/a "J,"
a/k/a "Jay,"

Defendants.

INDICTMENT

24 Cr. __

24 CRIM 077

COUNT ONE

(Conspiracy to Commit Unlicensed Business of Firearms Dealing)

The Grand Jury charges:

1. From at least in or about September 2023 through at least in or about January 2024, in the Southern District of New York and elsewhere, CHRISTEN CHEN, a/k/a "Nauti," a/k/a "Knotty," ZACHARY HAMPTON, a/k/a "J," a/k/a "Jay," and SHAQOYA HALL, a/k/a "Q," the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, engaging in the business of dealing in firearms without a license, in violation of Title 18, United States Code, Section 922(a)(1)(A).

2. It was a part and an object of the conspiracy that CHRISTEN CHEN, a/k/a "Nauti," a/k/a "Knotty," ZACHARY HAMPTON, a/k/a "J," a/k/a "Jay," and SHAQOYA HALL, a/k/a "Q," the defendants, and others known and unknown, not being licensed importers, licensed manufacturers, and licensed dealers of firearms within the meaning of Chapter 44, Title 18, United

States Code, would and did willfully and knowingly engage in the business of importing, manufacturing, and dealing in firearms, and in the course of such business ship, transport, and receive firearms in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(a)(1)(A).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about July 2023, CHRISTEN CHEN, a/k/a “Nauti,” a/k/a “Knotty,” and SHAQOYA HALL, a/k/a “Q,” the defendants, traveled from Georgia to Staten Island, New York in a rental car, by traveling through Manhattan via the Holland Tunnel and into Staten Island via the Verrazzano Narrows Bridge, while transporting four firearms for resale in New York City.

b. On or about October 16, 2023, CHEN, ZACHARY HAMPTON, a/k/a “J,” a/k/a “Jay,” and HALL, the defendants, met the CI in Staten Island, New York and sold the CI one firearm for approximately \$1,000.

c. In or about late summer or early fall 2023, HALL received a \$1,200 money transfer via a mobile banking application from CHEN for the purchase of at least four firearms. HALL then purchased at least four firearms in Georgia.

d. In or about late summer or early fall 2023, acting at CHEN’s direction, HALL traveled by bus from Atlanta, Georgia to a bus terminal in New York, New York while transporting at least four firearms.

e. In or about October 2023, HALL brought at least four firearms from a bus terminal in New York, New York to Staten Island, New York. On or about October 30, 2023,

CHEN and HALL met the CI in Staten Island where they sold the CI four firearms for approximately \$5,000.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Unlicensed Business of Firearms Dealing)

The Grand Jury further charges:

4. From at least in or about September 2023 through at least in or about January 2024, in the Southern District of New York and elsewhere, CHRISTEN CHEN, a/k/a “Nauti,” a/k/a “Knotty,” ZACHARY HAMPTON, a/k/a “J,” a/k/a “Jay,” and SHAQOYA HALL, a/k/a “Q,” the defendants, not being licensed importers, licensed manufacturers, and licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully and knowingly engaged in the business of importing, manufacturing, and dealing in firearms, and in the course of such business shipped, transported, and received firearms in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(a)(1)(A), to wit, CHEN, HAMPTON, and HALL worked together to purchase and otherwise obtain firearms in Georgia, among other places, which they then resold in New York, New York, among other places.

(Title 18, United States Code, Sections 922(a)(1)(A) and 2.)

COUNT THREE
(Interstate Travel with Intent to Engage in Firearms Trafficking)

The Grand Jury further charges:

5. From at least in or about September 2023 through at least in or about January 2024, in the Southern District of New York and elsewhere, CHRISTEN CHEN, a/k/a “Nauti,” a/k/a “Knotty,” ZACHARY HAMPTON, a/k/a “J,” a/k/a “Jay,” and SHAQOYA HALL, a/k/a “Q,” the defendants, with the intent to engage in conduct that constitutes a violation of Title 18, United

States Code, Section 922(a)(1)(A), traveled from one state into another state, and acquired and attempted to acquire firearms in the other state, in furtherance of such purpose, and aided and abetted the same, to wit, CHEN and HALL traveled between New York and Georgia, for the purpose of acquiring firearms in Georgia, with the intent that the firearms be resold in New York with the assistance of HAMPTON.

(Title 18, United States Code, Sections 924(n) and 2.)

FORFEITURE ALLEGATION

6. As a result of committing the offenses alleged in Counts Two and Three of this Indictment, CHRISTEN CHEN, a/k/a “Nauti,” a/k/a “Knotty,” ZACHARY HAMPTON, a/k/a “J,” a/k/a “Jay,” and SHAQOYA HALL, a/k/a “Q,” the defendants, shall forfeit to the United States, pursuant to Title 18, United States Codes, Sections 981(a)(1)(C) and 924(d)(1), and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense, and any and all firearms and ammunition involved in, used in, or intended to be used in said offenses, including but not limited to the following specific property:

- a. Taurus G2C 9mm pistol, Serial Number TLR57972, seized on or about October 16, 2023;
- b. Raven Arms MP25, Serial Number 1037662, seized on or about October 30, 2023;
- c. Taurus G2C 9mm pistol, Serial Number ADL932631, seized on or about October 30, 2023;
- d. Ruger LCP, Serial Number 371250198, seized on or about October 30, 2023;
- e. Smith & Wesson SD9, Serial Number FDC8722, seized on or about October 30, 2023;

- f. Hi-Point Firearm 9mm Luger Model C9, Serial Number 1953025, seized on or about January 30, 2024;
- g. Ruger Security 9mm pistol, Serial Number 385-61981, seized on or about January 30, 2024;
- h. Taurus Millennium G2 PT111 G2 9mm pistol, Serial Number TKS28049, seized on or about January 30, 2024;
- i. H&R Model 923 revolver 8 shot, Serial Number S25633, seized on or about January 30, 2024;
- j. Smith & Wesson M&P 9 shield 9mm pistol, Serial Number JDZ4347, seized on or about January 30, 2024;
- k. Springfield Armory XPS 40 caliber pistol, Serial Number AT183179, seized on or about January 30, 2024;
- l. Taurus G2S 9mm pistol, Serial Number TLX30900, seized on or about January 30, 2024; and
- m. Poly 80 9mm (no serial number), seized on or about January 30, 2024.

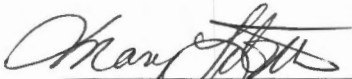
Substitute Assets Provision

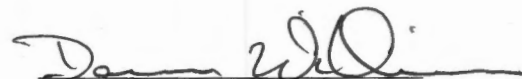
7. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 924;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON
2/12/2024


DAMIAN WILLIAMS
United States Attorney